

EXHIBIT G

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JENNIFER B. FUREY
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BRIAN D. GROSS *
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VIA FIRST CLASS MAIL

January 6, 2006

Flavia Benitez
P.O. Box 302437
Jamaica Plain, MA 02130

RE: Flavia Benitez v. Sodexho Marriott Services:
U.S. District Court, Civil Action No.: 04-CV-11959-NG

Dear Ms. Benitez:

Enclosed please find the following documents:

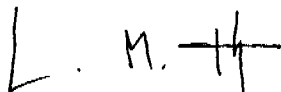
- (1) Defendant, Sodexho Marriott Services' Response to Plaintiff, Flavia Benitez's First Request for Production of Documents; and
- (2) Defendant's Answers to Plaintiff's First Set of Interrogatories.

Please note that the documents responsive to the plaintiff's document requests will be forwarded under separate cover letter.

COOLEY MANION JONES LLP

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "L. M. Haney" with a stylized flourish at the end.

Brian M. Haney

enclosure

cc: Kenneth J. Martin, Esq. (without enclosure)
David W. Hayes, Esq.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FLAVIA BENITEZ,
Plaintiff,

v.

SODEXHO MARRIOTT SERVICES,
Defendant.

C.A. NO.: 04-11959-NG

DEFENDANT, SODEXHO MARRIOTT SERVICES'
RESPONSE TO PLAINTIFF, FLAVIA BENITEZ'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS

Pursuant to Fed. R. Civ. P. 34, and Local Rule 34, defendant, Sodexho, Inc. ("Sodexho"), misnamed herein as Sodexho Marriott Services, Inc., hereby responds to the plaintiff, Flavia Benitez's ("Benitez") First Request for Production of Documents and Things as follows:

GENERAL OBJECTIONS AND STATEMENTS

1. Sodexho objects to each Request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial, subject to the attorney-client privilege, or any other privilege or protection, not reasonably calculated to lead to the discovery of admissible evidence or otherwise not within the scope of discovery permitted by the Federal Rules of Civil Procedure.

2. Sodexho's response shall not be deemed to constitute an admission: (1) that any particular document exists, is relevant, or is admissible in evidence; or (2) that any statement or characterization in the requests is accurate or complete.

3. Any inadvertent production by Sodexho of documents containing information protected from disclosure by the attorney-client privilege, work product doctrine or any other privilege or protection, shall not constitute a waiver by the defendant of such protection.

4. Sodexho objects to the plaintiff's requests to the extent that they are vague, ambiguous, overbroad, oppressive, overly burdensome, expensive or are not reasonably calculated to lead to the discovery of admissible evidence.

5. Sodexho objects to the plaintiff's requests to the extent they are not related to the time period or subject matter at issue.

6. Sodexho objects to any request that purports to compel Sodexho to create documents that do not already exist.

7. Sodexho objects to any request that purports to impose a duty on it to undertake a search for documents or things beyond a diligent search of its files where documents responsive to these requests would reasonably be found. Sodexho has diligently searched for documents responsive to these requests and will supplement its production if any additional responsive, non-privileged documents are located.

8. Sodexho objects to any request that purports to impose a duty on it to provide documents that are not in its possession, custody or control.

9. Sodexho objects to these requests to the extent the requests seek confidential and proprietary information. Any confidential or propriety information will only be produced after the parties have agreed to a suitable stipulation of confidentiality.

10. Sodexho objects to the instructions applicable to the plaintiff's request for documents to the extent those instructions seek to impose upon Sodexho obligations or burdens

which are greater than or inconsistent with the Federal Rules of Civil Procedure and decline to abide by those instructions.

11. Sodexho reserves the right to supplement or amend the objections and responses stated herein and to object to the admissibility in evidence of any portion of the documents produced in response to plaintiff's demands, or any of the information contained therein, at any hearing or trial in this action.

12. Wherever an objection, whether general or specific, is stated herein to all or any portion of a request, and an answer is thereafter stated to all or any portion of the request, the answer is stated without waiver of any portion to the objection.

13. Unless otherwise stated, Sodexho will not produce any documents or things encompassed by the foregoing objections.

14. Each of Sodexho's responses are subject to these General Objections and Statements.

DOCUMENT RESPONSES

REQUEST NO. 1

Plaintiff's complete personnel files.

RESPONSE NO. 1

Without waiving, and subject to the General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 2

All documents filed separately from plaintiff's personnel file which refer to plaintiff, including but not limited to medical records, performance evaluations and disciplinary measures.

RESPONSE NO. 2

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 3

All payroll documents pertaining to plaintiff's compensation by defendant, including but not limited to salary, commission, bonuses and any non-standard benefits (benefits beyond those listed in defendant's Human Resources material(s)).

RESPONSE NO. 3

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 4

All documents pertaining to the termination of plaintiff.

RESPONSE NO. 4

Without waiving, and subject to the General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 5

All documents containing, referring to or pertaining to criticism of or negative comments about plaintiff or her work, including but not limited to performance evaluations, written warnings and disciplines of any nature.

RESPONSE NO. 5

Without waiving, and subject to the General Objections and Statements, Sodexho will produce any such relevant, non-privileged documents in its possession, custody or control.

REQUEST NO. 6

All documents not listed above which refer to plaintiff directly or indirectly, which refer to her work directly or indirectly or which in any way pertain to any aspect of your company related to any responsibilities she held at any time under your employ, whether or not she held those responsibilities at the time of the document, for the entire period of her employment by you.

RESPONSE NO. 6

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege.

REQUEST NO. 7

All documents relating to complaints, lawsuits or administrative charges, informal or formal, internal or external, filed or pending during said period which allege discrimination on the basis of disability or handicap by you, including failure to accommodate.

RESPONSE NO. 7

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege.

REQUEST NO. 8

Any and all documents on which you rely in support of your first Affirmative Defense.

RESPONSE NO. 8

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 9

Any and all documents on which you rely in support of your second Affirmative Defense.

RESPONSE NO. 9

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 10

Any and all documents on which your rely in support of your third Affirmative Defense.

RESPONSE NO. 10

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 11

Any and all documents on which you rely in support of your fourth Affirmative Defense.

RESPONSE NO. 11

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks

information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 12

Any and all documents on which you rely in support of your fifth Affirmative Defense.

RESPONSE NO. 12

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 13

Any and all documents on which you rely in support of your sixth Affirmative Defense.

RESPONSE NO. 13

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General

Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 14

Any and all documents on which you rely in support of your seventh Affirmative Defense.

RESPONSE NO. 14

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 15

Any and all documents on which you rely in support of your eighth Affirmative Defense.

RESPONSE NO. 15

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 16

Any and all documents on which you rely in support of your ninth Affirmative Defense.

RESPONSE NO. 16

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 17

Any and all documents on which you rely in support of your tenth Affirmative Defense.

RESPONSE NO. 17

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 18

Any and all documents on which you rely in support of your eleventh Affirmative Defense.

RESPONSE NO. 18

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 19

Any and all documents on which you rely in support of your twelfth Affirmative Defense.

RESPONSE NO. 19

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 20

Any and all documents on which you rely in support of your thirteenth Affirmative Defense.

RESPONSE NO. 20

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 21

All documents reflecting or identifying fringe benefits provided to plaintiff by defendant.

RESPONSE NO. 21

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 22

All documents reflecting accommodations sought by plaintiff.

RESPONSE NO. 22

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections

and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 23

All documents reflecting accommodations offered by you.

RESPONSE NO. 23

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad and unduly burdensome.

REQUEST NO. 24

All documents pertaining to the decision to terminate plaintiff's health benefits.

RESPONSE NO. 24

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 25

All documents pertaining to plaintiff's request for disability benefits, including your response to any such requests.

RESPONSE NO. 25

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to

lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 26

All documents, including correspondence, sent to or received from the Massachusetts Commission Against Discrimination and Equal Employment Opportunity Commission, pertaining to plaintiff's claims of discrimination.

RESPONSE NO. 26

Sodexho objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 27

Any and all documents concerning your employment policies including but not limited to personnel policy manuals, handbooks or personnel memos issued by you and in effect for

RESPONSE NO. 27

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence.

REQUEST NO. 28

Any and all documents that relate to this case including any written or recorded statement made by any person you expect to call as a witness in this case.

RESPONSE NO. 28

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

REQUEST NO. 29

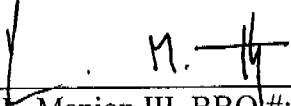
All other documents not produced in response to the above requests which pertain to the facts of the case.

RESPONSE NO. 29

Sodexho objects to this request on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Sodexho also objects to this request to the extent that it seeks information prepared or assembled in anticipation of litigation or for trial and/or is subject to the attorney-client privilege. Without waiving, and subject to the foregoing objections

and General Objections and Statements, Sodexho will produce all such relevant, non-privileged documents within its possession, custody and/or control.

SODEXHO, INC.,
by its attorneys,



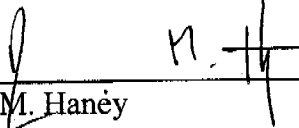
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COOLEY MANION JONES LLP
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Boston, MA 02110
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Dated: January 4, 2006

CERTIFICATE OF SERVICE

I, Brian M. Haney, attorney for Sodexho, Inc., misnamed herein as Sodexho Marriott Services, in the above-captioned action, hereby certify that on this 6th day of January, 2006, a copy of Defendant, Sodexho Marriott Services' Response to Plaintiff, Flavia Benitez's First Request for Production of Documents was served via first-class mail upon the plaintiff, Flavia Benitez, at the following address:

P.O. Box 302437
Jamaica Plain, MA 02130.



Brian M. Haney